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*Attorneys for the United States*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

HAROLD HOLMES, individually,

Plaintiff,

v.

SETH JAMES BROWN, individually;  
DOES I – X and ROE CORPORATIONS I  
– X, inclusive,

Defendants.

Case No. 2:23-cv-01487-APG-VCF

**Stipulation and Order**

**(First Request)**

Following the United States' removal of this case from Nevada state court and the United States' substitution as the defendant in place of Seth James Brown by operation of law under 28 U.S.C. § 2679(d)(2), the parties hereby stipulate to extend the time for the United States to file an Answer or otherwise respond to Plaintiff's Complaint to November 21, 2023, which is 60 days after the filing of the Petition for the removal of this case from state court (ECF No. 1).

This extension will allow undersigned counsel adequate time to receive and review any file materials or information from the client agency, the United States Air Force.

Undersigned defense counsel has consulted with Plaintiff's counsel, Mr. Randall, who advises that he does not object to the request for extension requested herein.

1 For the above reasons, Defendant United States respectfully requests this extension  
2 of time, to November 21, 2023, to file an Answer or otherwise respond to Plaintiff's  
3 Complaint.

4 This stipulated request is filed in good faith and not for the purposes of undue delay.

5 Respectfully submitted this 3rd day of October 2023.

6 ER INJURY ATTORNEYS

JASON M. FRIERSON  
United States Attorney

7  
8 /s/ Justin G. Randall  
9 JUSTIN G. RANDALL, ESQ.  
Nevada Bar No. 12476  
10 1700 S. Pavilion Center Drive Ste #530  
Las Vegas, NV 89135  
11 *Attorney for Plaintiff*

/s/ R. Thomas Colonna  
R. THOMAS COLONNA  
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13 **IT IS SO ORDERED:**

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15 **UNITED STATES MAGISTRATE JUDGE**

16 **DATED:** 10-6-2023  
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